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January 31, 2003

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Ex Parte

JAN 31 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
455 12th Street, S.W. - Portals  
Washington, DC 20554

**Re: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184 - REDACTED**

Dear Ms. Dortch:

On November 15, 2002, Verizon submitted a letter to William Maher, Chief of the Wireline Competition Bureau certifying that Verizon's separate advanced services division is using Verizon's OSS interfaces for more than 75% of the pre-ordering inquiries and ordering transactions for unbundled network elements used to provide advanced services it submits to Verizon in New Jersey. While this letter was stamped received on November 15, 2002, it was inadvertently not formally filed. Verizon is now filing it for the record. Verizon New Jersey will cease providing the OSS Discount specified in paragraph 25 of Appendix D to the Bell Atlantic/GTE Merger Order in New Jersey on or after March 1, 2003.

The attachments to the letter contain proprietary information and have been redacted. A confidential version is also being filed. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann D. Berkowitz", is written over a horizontal line.

cc: W. Maher  
M. Del Duca  
C. Matthey

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REDACTED - FOR PUBLIC INSPECTION

Dee May  
Assistant Vice President  
Federal Regulatory



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November 15, 2002

RECEIPT

William Maher  
Chief, Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RECEIVED - FCC

NOV 15 2002

Federal Communication Commission  
Bureau / Office

Dear Mr. Maher:

The purpose of this letter is to certify that Verizon's separate advanced services division is using Verizon's **OSS** interfaces for more than **75%** of the pre-ordering inquiries and ordering transactions for unbundled network elements used to provide advanced services it submits to Verizon in New Jersey.

**The** OSS interfaces for pre-ordering and ordering unbundled network elements used to provide advanced services were developed and deployed in conformance with Section VI of the Bell Atlantic/GTE Merger Conditions. Accordingly, Verizon **New** Jersey will cease providing the OSS Discount specified in paragraph 25 of Appendix D to the Bell Atlantic/GTE Merger Order in New Jersey on or after December 15, 2002. **We** will notify CLECs of the cessation of the discount.

This certification is based on the attached Declarations of Jeannie Diefenderfer, Group President-Systems, Billing & Process Assurance, and Marion Jordan, Vice President, Wholesale Customer Support, and the facts stated there.

The **attachments** to **the** Declaration of Jeannie Diefenderfer contain proprietary information and is subject to confidential treatment. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".  
Attachments  
Attachments

cc: M. Del Duca  
C. Matthey

## DECLARATION OF JEANNIE DIEFENDERFER

1. My name is Jeannie Diefenderfer. I am Group President-Systems, Billing & Process Assurance. My responsibilities include systems planning, implementation, and operations for advanced services. In addition, I am responsible for advanced services' billing operations and performance assurance, and for support functions such as business planning, program/project management, and regulatory compliance.

2. I have more than 18 years of experience in the telecommunications industry in a variety of engineering and operations positions working for NYNEX, Bell Atlantic, and now Verizon. Prior to assuming my current responsibilities, I was Group President, Advanced Networks for Verizon.

3. The purpose of my statement is to demonstrate that Verizon's separate broadband division (VZ BB) uses the pre-ordering and ordering interfaces provided by Verizon for at least 75% of the pre-ordering inquiries and 75% of the orders VZ BB submits to Verizon for unbundled network elements used to provide xDSL and other Advanced Services in New Jersey. ~~This~~ is the second condition, described by Ms. Jordan, that Verizon must meet to discontinue the advanced services loop discount under paragraph 25 of the Merger Conditions.

4. In New Jersey, the New Jersey Board of Public Utilities did not approve the transfer of assets necessary to establish a separate data affiliate following the merger between Bell Atlantic and GTE. Verizon did establish a separate division in New Jersey, however, and in conjunction with the reintegration of the separate affiliate in other states, undertook the conversion of the separate division's operations in New Jersey to the use of

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the **same** interfaces available to all CLECs for the submission DSL line sharing orders.

This conversion process was completed in early July 2002.

4. In New Jersey, ~~as~~ in the other former Bell Atlantic service areas, VZ BB uses the CORBA and the Web GUI interfaces to obtain access to Verizon's **OSS** for pre-ordering functions. These are the same CORBA and Web GUI interfaces used by CLECs operating in the former Bell Atlantic service areas for pre-ordering. **For** ordering, VZ BB uses ~~an~~ Electronic Data Interchange (EDI) interface to obtain access to Verizon's **OSS**. This is the same EDI used by CLECs operating in the former Bell Atlantic service areas to obtain access **to** Verizon's ordering **OSS**.

#### Pre-Order

5. In New Jersey, VZ BB is using the same CORBA and Web **GUI** interfaces that are available to all unaffiliated CLECs operating in the former Bell Atlantic service areas for 100% of the pre-ordering transactions it has submitted to Verizon. Attachment 1 to my Declaration provides the volume of pre-order transactions VADI **has** submitted using the electronic interfaces in these service areas during the third quarter of **2002** (July through September).

#### Ordering

6. In New Jersey, for ordering unbundled network elements used to provide advanced services (DSL line sharing), VZ BB has contracted with a third-party service bureau offered by Telcordia, **ExchangeLink**, to submit orders to the Verizon local telephone operating companies. A system **known as** Delivery, which VZ BB has licensed **from** Telcordia, transmits the order information needed to submit **a** line **sharing** order to Verizon's local telephone operating companies from VZ BB's systems to that service

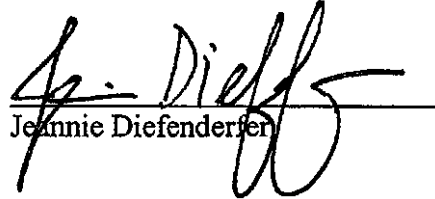
bureau. The service bureau primarily submits its orders to the Verizon local telephone operating companies over the EDI interface using **LSOG 4** {still? or **LSOG 5**?}. The EDI interface is available to all CLECs. In addition, CLECs can contract with Telcordia to provide this service. In the third quarter of 2002 (July through September), VZ BB has submitted 100% of its orders for unbundled network elements used to provide advanced services (DSL line sharing) using Telcordia's ExchangeLink service bureau to submit orders over the EDI interface. Attachment 2 to my Declaration provides the volume of ordering transactions VADI has performed using EDI in these service areas during the third quarter of 2002 (July through September).

#### Conclusion

7. In **summary**, VZ BB is using the pre-ordering and ordering interfaces that Verizon makes available to unaffiliated CLECs for well over **75%** of the pre-order inquiries and well over **75%** of the orders VZ BB submits to Verizon for pre-ordering and ordering unbundled network elements **used** to provide xDSL and other Advanced Services in New Jersey.

8. This concludes my Declaration.

I, Jeannie Diefenderfer, hereby swear, under penalty of perjury, that the foregoing  
is true and correct, to the best of my knowledge and belief.

  
Jeannie Diefenderfer

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## DECLARATION OF MARION JORDAN

1. My name is Marion Jordan. My business address is 1320**North** Courthouse Road, Arlington, Virginia. I joined Verizon in 1994. I **am** currently employed by Verizon Services Cop. **as** Vice President, Wholesale Customer Support within the Wholesale Services organization. My organization provides technical support to assist CLECs operating in the Verizon service **areas**. This assistance includes the Change Management process which ensures that the CLECs receive timely information concerning interface changes and the Wholesale Customer Care Center which serves as a single point of contact for system related issues. In addition, specialized teams within my organization work with CLECs to assist with connectivity requirements, training and documentation **of** Business Rules and technical specifications. My organization oversaw **Verizon's** participation in the Plan of Record collaboratives with CLECs as provided for in the Bell Atlantic/GTE Merger Conditions.

2. **Prior** to assuming my current responsibilities, I was the Director **-** System Management Services in the **Telecom** Systems organization. In that position, I was responsible for directing the systems development work required by Verizon to meet the requirements of the Telecommunications Act and to enable CLECs to obtain access to the Verizon Operating Support Systems (OSS).

3. Before joining Verizon, I was employed by MCI where I held different positions **of** increasing responsibility in the **areas** of software implementation, marketing and customer service.

4. The purpose of my declaration is to describe the OSS interfaces that Verizon has deployed to support pre-ordering and ordering transactions for unbundled

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network elements used by CLECs and the Verizon retail broadband division (VZ BB) to provide advanced services to their customers in New Jersey. I also demonstrate that Verizon has developed and deployed **OSS** interfaces for pre-ordering and ordering unbundled network elements **used** to provide advanced services in conformance with Section VI of the Bell Atlantic/GTE Merger Conditions.

#### Pre-Ordering

5. In New Jersey, **as** in the other former Bell Atlantic service areas, Verizon offers three pre-ordering interfaces. Two are application-to-application interfaces: Electronic Data Interchange (**EDI**) and Common Object Request Broker Architecture (CORBA). The third is a Web-based Graphical User Interface (Web GUI). All three interfaces provide CLECs with the ability to obtain loop qualification information on an automated basis.

#### Ordering

6. In New Jersey, as in the other former Bell Atlantic service areas, Verizon provides CLECs a choice of two interfaces for submitting orders – **EDI** and the Web **GUI**. Both interfaces provide CLECs with the ability to submit orders electronically for UNE DSL-capable loops, line sharing, and line splitting.

#### Compliance with Paragraph 25 of the Bell Atlantic/GTE Merger Conditions

7. Paragraph 25 of the Merger Conditions contains two conditions that must be met before Verizon can discontinue the advanced services loop discount. First, Verizon is required to develop and deploy within the Bell Atlantic service areas and separately within the GTE service **areas** uniform **OSS** interfaces for pre-ordering and ordering unbundled network elements **used** to provide DSL and other advanced services.



Second, Verizon must certify that Verizon's advanced services data affiliate uses those same *OSS* interfaces for at least 75 percent of the pre-ordering and ordering transactions it **uses** to purchase components to provide advanced services. If Verizon no longer provides Advanced Services through a separate affiliate, it must demonstrate that the separate broadband division (which I call "VZ BB") **uses** those **same** *OSS* interfaces for at least 75 percent of the pre-ordering and ordering transactions it uses to purchase components to provide advanced services. **See** Paragraph 12.b. of the Merger Conditions,

8. In New Jersey, **as** described by **Ms.** Diefenderfer, VZ BB began using the **same** interfaces available to unaffiliated CLECs to submit significant volumes of DSL line sharing orders in early July 2002.

9. The purpose of the first requirement – that Verizon develop and deploy uniform *OSS* interfaces for pre-ordering and ordering unbundled network elements used to provide advanced services – was to **facilitate** competition by making it easier for CLECs to perform pre-ordering and ordering functions necessary to obtain and provide unbundled network elements they use to provide competitive advanced services. This obligation ensured *that* CLECs who accessed Verizon's systems to perform pre-ordering and ordering functions **for** these unbundled network elements could use the same pre-ordering and ordering interfaces and have the **same** data input and formatting requirements when they ordered unbundled network elements to provide advanced services in New Jersey **as** when they ordered unbundled network elements in Massachusetts or other states within the former Bell Atlantic service areas. **It** also ensured that the pre-ordering and ordering functions that were available electronically in one former Bell Atlantic state would be available in other former Bell Atlantic states.

10. The purpose of the second requirement was to prevent discriminatory treatment by ensuring that Verizon's affiliate (or separate division) **uses** the same interfaces for its own pre-ordering and ordering transactions for the unbundled network elements it uses to provide advanced services as are available to unaffiliated CLECs.

11. Consistent with the Merger Conditions, Verizon complied with the first requirement through the development of the Plan of Record ("POR") and the implementation of its terms. Verizon drafted a POR and submitted it to the Commission and to CLECs for review and comment on September 28, 2000. Among other things, the POR included a description of Verizon's existing pre-ordering and ordering interfaces and functions and Verizon's plan for developing and deploying uniform **OSS** interfaces for pre-ordering and ordering unbundled network elements, including unbundled network elements used to provide advanced services as required by the advanced services discount condition. Verizon then conducted several collaborative sessions to address uniformity of pre-ordering and ordering interfaces in the former Bell Atlantic region. When the collaborative sessions were completed, Verizon finalized the Plan of Record and set forth its pre-ordering and ordering interface commitments for the former Bell Atlantic service area in Sections **III(B)(2)** (pre-ordering) and **III(B)(3)** (ordering). The final version of the Plan of Record **was** submitted **to the** Commission on December 22, 2000.

12. As section **III(B)(2)** makes clear, there **were** no outstanding commitments for enhancements, products, functionalities, capabilities, features, **or** services with respect to pre-ordering interfaces in the former Bell Atlantic service **areas** set forth in the Plan of Record. Verizon provides CLECs operating in the former Bell Atlantic service **areas**,

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including New Jersey, with the three separate interfaces described above to perform pre-ordering functions, and each is uniform across the former Bell Atlantic footprint.

13. For ordering, Verizon had two commitments to provide product enhancements. Section III(B)(3)(d) of the Plan of Record provided that Verizon would enhance its ordering OSS interfaces to allow CLECs to order a NID (Network Interface Device) and an IDSL (ISDN Digital Subscriber Line) using EDI and the Web **GUI**. Verizon completed these enhancements, enabling CLECs to use the ordering OSS interfaces to order these products, in October 2000. Verizon, however, did not revise this section of the Plan of Record (between the September 28 and December 22 versions) to reflect the completion of this commitment.

14. In sum, Verizon developed and deployed uniform OSS interfaces for pre-ordering and ordering unbundled network elements, including unbundled network elements **used** to provide advanced services, in the former Bell Atlantic service areas including New Jersey and, therefore, has satisfied the first requirement of paragraph **25** of **the** Merger Conditions.

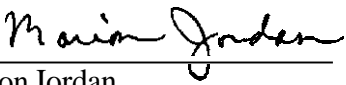
#### Conclusion

15. The pre-ordering and ordering interfaces Verizon **makes** available to CLECs for ordering unbundled network elements used to provide advanced services within the Bell Atlantic service areas **are** uniform and they **are** the same pre-ordering and ordering interfaces used by VZ BB for ordering unbundled network elements used to provide advanced services.

16. This concludes **my** declaration.

I declare under penalty of **perjury** under the laws of the United States of America that the foregoing is true and correct to the best **of** my knowledge and belief.

Executed on 11/15, 2002

  
\_\_\_\_\_  
Marion Jordan